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April 2, 2024

**VIA ECF**

The Honorable Arun Subramanian, U.S.D.J  
United States District Court  
Southern District of New York  
500 Pearl St., Courtroom 15A  
New York, NY 10007-1312

Re: *Dominique Boulette v. New York Society for the Relief of the Ruptured and Crippled,  
Maintaining the Hospital for Special Surgery, individually and d/b/a "Hospital for Special  
Surgery"*  
Case No.: 1:24-CV-00594 (AS)

Dear Judge Subramanian:

This firm represents Defendant New York Society for the Relief of the Ruptured and Crippled, Maintaining the Hospital for Special Surgery d/b/a "Hospital for Special Surgery" ("Defendant") in the above-referenced matter commenced by Plaintiff Dominique Boulette ("Plaintiff"). The parties have mutually agreed to participate in a private mediation of Plaintiff's claims, which they hope to schedule shortly. Accordingly, we write jointly with counsel for Plaintiff to respectfully request a stay of deadlines in this matter so that the parties may engage fully in their resolution efforts.

Plaintiff's Complaint was filed on January 26, 2024, and Defendant's responsive pleading is currently due on April 8, 2024. The parties respectfully request that Defendant's time in which to answer or respond to the Complaint be stayed until 2 weeks after the parties declare an end to their mediation efforts. This is a joint request by both parties, and it is the first request by either party for a stay or adjournment. This stay, if granted, would also affect the following deadlines: the parties' deadline to file a joint Case Management Plan (presently due on May 6, 2024) and the parties' Initial Pre-Trial Conference with the Court (Dkt. No. 5, presently scheduled for May 8, 2024).

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The parties thank the Court for its time and consideration of the instant request. Should Your Honor require additional information or like to speak with the parties, we will make ourselves available at the Court's convenience.

Respectfully,

/s/ Amy J. Traub

Amy J. Traub

*Attorneys for Defendant*

/s/ Max C. Bracero Esq.

Max C. Bracero

*Attorneys for Plaintiff*

Application granted in part. The Court will not stay this case for settlement. But it will extend the deadline for Defendant's responsive pleading to April 22, 2024. The parties' deadline to file the CMP and the date of the initial pretrial conference remain the same.

The Clerk of Court is directed to terminate the motion at Dkt. 10.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: April 3, 2024